

Gustavo F. Bruckner  
POMERANTZ LLP  
600 Third Avenue, 20th Floor  
New York, New York 10016  
Phone: 212-661-1100  
Fax: 917-463-1044  
Email: gbruckner@pomlaw.com

*Counsel for Lead Plaintiff Movant Yun Wang*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ALI KARIMI, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

DEUTSCHE BANK  
AKTIENGESELLSCHAFT, JOHN  
CRYAN, CHRISTIAN SEWING, and  
JAMES VON MOLTKE,

Defendants.

Case No. 1:20-cv-08978-ES-MAH

**DECLARATION OF  
DOLGORA DORZHIEVA**

DOLGORA DORZHIEVA, of full age, declares under penalty of perjury as follows:

1. I am an attorney licensed to practice in New York and an Associate of Pomerantz LLP, attorneys for Lead Plaintiff Movant Yun Wang in the above matter. I am fully familiar with the facts contained herein based upon my personal

knowledge. I make this Declaration in support of my application to be admitted *pro hac vice* in the above matter.

2. I am a member in good standing of the courts set forth in Schedule A attached.

3. There are no disciplinary proceedings against me as a member of the bar in any jurisdiction, nor have I ever been the subject of any disciplinary proceedings.

4. Pomerantz LLP, is serving as local counsel on behalf of our client in accordance with L.Civ.R. 101.1(c).

5. I understand that if I am admitted to appear and participate *pro hac vice*:

(a) I shall abide by the rules governing the courts of the State of New Jersey, including all disciplinary rules, and L.Civ.R. 101.1;

(b) I shall consent to the disciplinary jurisdiction of this Court and to the appointment of the Clerk of the Supreme Court of the State of New Jersey as an agent upon whom service may be made for all actions against me and/or my firm that may arise out of my participation in connection with this matter;

(c) I shall notify this court immediately of any matter affecting my standing at the bar of any other court;

(d) I shall have all pleadings, briefs, and other papers filed with the court signed by an attorney of record authorized to practice in this state;

(e) I will pay the \$150 fee provided by L.Civ.R. 101.1 and the annual payment to the Ethics Financial Committee and the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Rule 1:28-2(a) for each calendar year in which this case is pending.

6. I hereby declare, under penalty of perjury, that the foregoing is true and correct.

Dated: October 22, 2020

Respectfully submitted,



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Dolgora Dorzhieva  
**POMERANTZ LLP**  
600 Third Avenue, 20th Floor  
New York, New York 10016  
Phone: 212-661-1100  
Fax: 917-463-1044  
Email: ddorzhieva@pomlaw.com

*Counsel for Lead Plaintiff Movant Yun Wang*

SCHEDULE A

State of New York  
Appellate Division  
2<sup>nd</sup> Department  
45 Monroe Place  
Brooklyn, NY 11201

Bar# 5473129

Admitted: 11/09/2016

Southern District of New York  
500 Pearl Street  
New York, NY 10017

Admitted: 05/2018